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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.  
23 **DECLARATION OF LINDSAY COOPER  
24 IN SUPPORT OF PLAINTIFF WAYMO  
25 LLC'S ADMINISTRATIVE MOTION TO  
26 FILE UNDER SEAL PORTIONS OF ITS  
27 MOTION FOR ORDER TO SHOW  
28 CAUSE WHY OTTO TRUCKING  
SHOULD NOT BE HELD IN CONTEMPT  
OF THE PRELIMINARY INJUNCTION  
ORDER (Dkt. 426)**

17 UBER TECHNOLOGIES, INC.;  
18 OTTOMOTTO LLC; OTTO TRUCKING  
19 LLC,

20 Defendants.

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1 I, Lindsay Cooper, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal portions of its Motion for Order to Show Cause why Otto Trucking Should Not be Held in  
 8 Contempt of the Preliminary Injunction Order (Dkt. 426), filed concurrently herewith (the  
 9 “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Motion	Highlighted Portions	Defendants (blue highlighting) and/or non-party Lior Ron
Judah Declaration Ex. 1-3, 5-6	Entire Document	Defendants and/or non-party Lior Ron

15       3. The highlighted portions of Waymo’s Motion and Judah Declaration Ex. 1-3, 5-6  
 16 contain references to information that Defendants and/or non-party Lior Ron have designated as  
 17 confidential and/or highly confidential.

18       4. Waymo expects Defendants and/or Lior Ron to file one or more declarations in  
 19 accordance with the Local Rules.

20       I declare under penalty of perjury under the laws of the State of California and the United  
 21 States of America that the foregoing is true and correct, and that this declaration was executed in Los  
 22 Angeles, California, on July 10, 2017.

24       By /s/ Lindsay Cooper

25                   Lindsay Cooper  
 26                   Attorney for WAYMO LLC

## **SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven